

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	:	
	:	
PLAINTIFF,	:	
	:	
v.	:	CIVIL NO. 22-cv-23
	:	
\$36,504.72 IN UNITED STATES FUNDS	:	
SEIZED FROM COMMERCE BANK	:	
ACCOUNT 7601 and \$7,600.00 IN	:	
UNITED STATES CURRENCY,	:	
	:	
DEFENDANTS.	:	

**VERIFIED COMPLAINT FOR FORFEITURE**

The United States of America, by and through its attorneys, Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and Adam E. Hanna, Assistant United States Attorney, states as follows:

**Count I**

1. This is a civil action in rem for the forfeiture of property which constitutes or is derived from proceeds of violations of Title 7, United States Code, Section 2024(b).
2. This Court has subject-matter jurisdiction over this matter by virtue of 28 U.S.C. § 1345, *in rem* jurisdiction by virtue of 28 U.S.C. § 1355, and venue by virtue of 28 U.S.C. § 1395(b).
3. The defendant property is \$36,504.72 in United States Currency.
4. The defendant property was seized on or about September 1, 2021, from Commerce Bank Account 7601 held in the name of Nedal Nijmeh.
5. The property consists of currency which has been deposited Customs and Border Protection Suspense Account.
6. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in Exhibit A, which is attached and fully incorporated by reference.

7. The defendant property is property which constitutes or is derived from proceeds of violations of Title 7, United States Code, Sections 2024(b) (or fungible property as defined by 18 U.S.C. § 984) and is forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C).

8. The property is already in the possession, custody, and control of the United States.

WHEREFORE, the United States of America respectfully requests that a Warrant and Summons for Arrest of Articles *In Rem* be issued for the \$36,504.72 in United States Currency; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property to be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

### **Count II**

1. This is a civil action in rem for the forfeiture of property which constitutes or is derived from proceeds of violations of Title 7, United States Code, Section 2024(b).

2. This Court has subject-matter jurisdiction over this matter by virtue of 28 U.S.C. § 1345, *in rem* jurisdiction by virtue of 28 U.S.C. § 1355, and venue by virtue of 28 U.S.C. § 1395(b).

3. The defendant property is \$7,600 in United States Currency.

4. The defendant property was seized on or about August 12, 2021, from the residence of Nedal Nijmeh located in O'Fallon, St. Clair County, Illinois.

5. The property consists of currency which has been deposited in the Customs and Border Protection Suspense Account.

6. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in Exhibit A, which is attached and fully incorporated by reference.

7. The defendant property is property which constitutes or is derived from proceeds of violations of Title 7, United States Code, Sections 2024(b) (or fungible property as defined by 18 U.S.C. § 984) and is forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C).

8. The property is already in the possession, custody, and control of the United States.

WHEREFORE, the United States of America respectfully requests that a Warrant and Summons for Arrest of Articles *In Rem* be issued for the \$36,504.72 in United States Funds seized from Commerce Bank Account 7601; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property to be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

STEVEN D. WEINHOFET  
United States Attorney

*/s/ Adam E. Hanna*  
ADAM E. HANNA  
Assistant United States Attorney  
Nine Executive Drive  
Fairview Heights, Illinois 62208  
(618) 628-3700

**DECLARATION**

I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations and the agent assigned the responsibility for this case.

I have read the contents of the foregoing complaint for forfeiture and the exhibits thereto, and the statements contained therein are true to the best of my knowledge and belief.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury the foregoing is true and correct.

Executed on this 6th day of January, 2022.

*/s/ Marijo T. Gronewold w/consent*  
MARIJO T. GRONEWOLD  
Special Agent  
United States Department of Homeland  
Security, Homeland Security Investigations